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March 18, 2024

Hon. Lorna G. Schofield  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**RE: *Paradise Morgan et al. vs. Fount Society, LLC*; U.S. District Court, Southern District N.Y., Civ. Action No.: 1:24-cv-01166-LGS**

Dear Judge Schofield:

I represent the defendant, Fount Society, LLC (“Defendant”) in the above-referenced action, wherein the plaintiff, Paradise Morgan, (“Plaintiff”) (Plaintiff and Defendant are hereinafter collectively referred to as “Parties”) alleges that Defendant failed to design, construct, maintain, and operate its website to be fully accessible to, and independently usable by, Plaintiff and other blind or visually impaired persons. On behalf of Defendant, I write to request a 30-day extension of time for Defendant to respond to the Complaint.

On February 16, 2024, Plaintiff filed a Complaint against Defendant in the U.S. District Court for the Southern District of New York. Defendant was served with a copy of the Complaint on, February 26, 2024, making the response to the Complaint due on March 18, 2024.

We have conferred with Plaintiff’s counsel, and they consent to our request for an extension for Defendant to respond to the Complaint. The extension is needed to analyze and/or investigate the matters set forth in the Complaint, confer with our client, explore settlement, and, if necessary, prepare a response. No previous requests for an extension of time to respond have been made by Defendant. The requested extension does not affect any other scheduled dates.

Accordingly, on behalf of Defendant, I respectfully request an extension of time for Defendant to file a response to the Complaint, from March 18, 2024, to April 17, 2024.

Thank you for your consideration of this request.

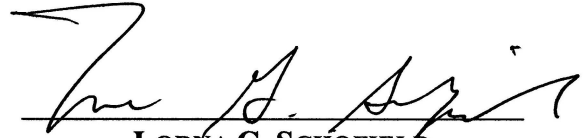
Respectfully Submitted,

By: /s/ Deyuan Lin  
Deyuan Lin

CC: Dan Shaked, Esq. (via ECF)

Defendant's application to extend the deadline to respond to the Complaint is **GRANTED**. Defendant shall respond to the Complaint by **April 17, 2024**. Plaintiff's request to adjourn the initial pretrial conference because Defendant had not appeared is **DENIED** as moot. The initial pretrial conference scheduled for **March 27, 2024**, shall proceed as scheduled. The parties shall file their pre-conference materials as soon as possible and no later than **March 22, 2024**. The Clerk of Court is respectfully directed to close the motions at Dkt. Nos. 7 and 8.

Dated: March 20, 2024  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**